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Nevada State Bar No. 10902  
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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BRENNA SCHRADER, an individual, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;  
MAURICE WOODEN, an individual, WYNN  
LAS VEGAS, LLC dba WYNN LAS VEGAS  
a Nevada Limited Liability, WYNN  
RESORTS, LTD, a Nevada Limited Liability  
Company; and DOES 1-20, inclusive; ROE  
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND  
DEADLINE FOR PLAINTIFF TO FILE  
A RESPONSE TO DEFENDANTS'  
MOTION TO DISMISS, MOTION FOR  
MORE DEFINITE STATEMENT AND  
MOTION TO STAY DISCOVERY**

**(SECOND REQUEST – Response to  
Motion to Dismiss, Motion for a More  
Definite Statement and Motion to Stay  
Discovery)**

1 IT IS HEREBY STIPULATED by and between Plaintiff, Brenna Schrader, (“Plaintiff”),  
2 through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendants, Wynn Las  
3 Vegas, LLC (“Defendant Wynn, LLC”) and Wynn Resorts, Ltd. (“Defendant Resorts”), through  
4 their counsel Jackson Lewis P.C., Defendant, Stephen Alan Wynn (“Mr. Wynn”), through his  
5 counsel Peterson Baker, PLLC, and Defendant, Maurice Wooden (“Mr. Wooden”), by and  
6 through his counsel Kennedy & Couvillier, (collectively “Defendants”), that Plaintiff shall have  
7 an extension to May 1, 2020 to file a response to all pending motions.

8 This Stipulation is submitted and based upon the following:

9 1. On March 6, 2020, Defendant Wynn, LLC filed a Motion to Dismiss [ECF No. 35]  
10 to which Defendant Resorts filed a Joinder [ECF No. 37]; Defendant Resorts filed a Motion to  
11 Dismiss [ECF No. 36]; Mr. Wynn filed a Motion to Dismiss [ECF No. 39]; and Mr. Wooden  
12 filed a motion for a more definite statement [ECF No. 33.]

13 2. In addition, Defendant Wynn, LLC and Defendant Resorts, filed a Motion to Stay  
14 Discovery [ECF No. 38], to which Mr. Wynn and Mr. Wooden filed a Joinder [ECF Nos. 40, 42].

15 3. Previously, on March 20, 2020, the parties stipulated to allow Plaintiff a 21-day  
16 extension to file a response by April 10, 2020 to Defendants’ motions as listed above.

17 4. Due to the complexity of the motions filed and the current complications made by  
18 the Coronavirus, the parties respectfully request the Court grant Plaintiff an additional extension  
19 up to and including May 1, 2020 to file a response to Defendants’ motions.

20 5. This is the second request for an extension of time to file a response to Defendants’  
21 motions.

22 6. This request is made in good faith and not for the purpose of delay.

23 7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed  
24 as waiving any claim and/or defense held by any party.

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1 Dated this 3rd day of April, 2020.

2 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

3 /s/ Burke Huber

/s/ Joshua A. Sliker

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*Wynn Las Vegas, LLC and Wynn Resorts,*  
*Ltd.*

8 KENNEDY & COUVILLIER

PETERSON BAKER, PLLC

10 /s/ Maximiliano Couvillier

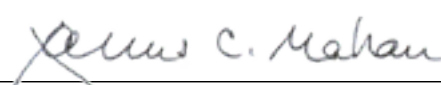
/s/ Nikki L. Baker

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15 *Maurice Wooden*

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Las Vegas, Nevada 89101  
*Attorney for Defendant*  
*Stephen Alan Wynn*

15 **ORDER**

16 IT IS SO ORDERED:

18   
19 UNITED STATES DISTRICT JUDGE

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21 Dated: \_\_\_\_\_  
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